

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

AFSHIN ZARINEBAF, ZACHARY) Case No. 1:18-cv-06951
CHERNIK, and JOAN MEYER, individually)
and on behalf of a class of similarly situated) Honorable Virginia M. Kendall
individuals,)
)
)
Plaintiffs,)
v.)
)
CHAMPION PETFOODS USA INC. and)
CHAMPION PETFOODS LP,)
)
Defendants.)

**PLAINTIFFS' MOTION TO FILE CERTAIN PORTIONS OF THEIR MOTION FOR
CLASS CERTIFICATION UNDER SEAL**

Pursuant to Local Rule 26.2(c), Plaintiffs respectfully move for an order sealing certain portions of their Motion for Class Certification (“Motion”), which is being filed simultaneously herewith. The pertinent portions of the Motion contain sensitive proprietary, business, trademark, or intellectual property information. Accordingly, Plaintiffs file the instant Motion for Leave to File Under Seal and have filed a redacted, public version of the following documents to protect Defendants’ privacy and confidentiality interests in this document and the information contained therein:

1. Memorandum in Support of Motion for Class Certification;
2. Exhibits: 12, 13, 14, 19, 20, 22, 25, 27, 28, 32, 53, 54, 59, and 60.

WHEREFORE, Plaintiffs respectfully request an Order.

- A. Granting this Motion;
- B. Permitting portions of the Memorandum in Support of Motion for Class Certification to remain under seal;

- C. Permitting Exhibits 12, 13, 14, 19, 20, 22, 25, 27, 28, 32, 53, 54, 59, and 60 to be filed under seal in their entirety;
- D. Granting such further relief as this Court deems equitable and just.

Dated: February 24, 2021

LOCKRIDGE GRINDAL NAUEN P.L.L.P.

By: s/ Rebecca A. Peterson
REBECCA A. PETERSON (*pro hac vice*)
ROBERT K. SHELQUIST (*pro hac vice*)
100 Washington Avenue South, Suite 2200
Minneapolis, MN 55401
Telephone: (612) 339-6900
Facsimile: (612) 339-0981
E-mail: rapeterson@locklaw.com
rkshelquist@locklaw.com

ROBBINS ARROYO LLP
KEVIN A. SEELY (*pro hac vice*)
5040 Shoreham Place
San Diego, CA 92122
Telephone: (619) 525-3990
Facsimile: (619) 525-3991
E-mail: kseely@robbinsarroyo.com

GUSTAFSON GLUEK, PLLC
DANIEL E. GUSTAFSON (*pro hac vice*)
RAINA C. BORRELLI (*pro hac vice*)
Canadian Pacific Plaza
120 South 6th Street, Suite 2600
Minneapolis, MN 55402
Telephone: (612) 333-8844
Facsimile: (612) 339-6622
E-mail: dgustafson@gustafsongluek.com
rborrelli@gustafsongluek.com

CUNEO GILBERT & LADUCA, LLP
CHARLES J. LADUCA (N.Y. Bar No. 3975927)
KATHERINE VAN DYCK (*pro hac vice*)
4725 Wisconsin Ave NW, Suite 200
Washington, DC 20016
Telephone: 202-789-3960
Facsimile: 202-789-1813
E-mail: charles@cuneolaw.com
kvandyck@cuneolaw.com

LITE DEPALMA GREENBERG, LLC
JOSEPH J. DEPALMA (*pro hac vice*)
SUSANA CRUZ HODGE (*pro hac vice*)
570 Broad Street, Suite 1201
Newark, NJ 07102
Telephone: (973) 623-3000
E-mail: jdepalma@litedepalma.com
scrushodge@litedepalma.com

Attorneys for Plaintiffs